UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TENNESSEE EASTERN DIVISION

JUDY PAYTON, an Individual,

Plaintiff,

Judge J. Breen

v.

Magistrate Judge Edward G. Bryant

STANFILL, INC., a Tennessee Corporation, d/b/a Stanfill Sonics,

Case No.: 1:13-cv-01215

Defendant.

JOINT NOTICE OF SETTLEMENT

Defendant Stanfill, Inc. ("Defendant"), by and through its attorneys, Fisher & Phillips, LLP, and Plaintiff Judy Payton ("Plaintiff"), by and through her attorneys, Jackson, Shields, Yeiser & Holt, provide their Joint Notice of Settlement, and in support thereof, state as follows:

- 1. The parties have reached an agreement as to the resolution of this ENTIRE litigation and as to ALL parties.
- 2. The parties are in the process of executing the Settlement Agreement and anticipate distributing the settlement monies within the next thirty (30) days.
- 3. The parties anticipate submitting a joint stipulation requesting the dismissal of this matter, with prejudice and in its entirety, after the distribution of the settlement monies.

WHEREFORE, Defendant, Stanfill, Inc., and Plaintiff, Judy Payton, provide their Joint Notice of the Settlement in this matter, and respectfully request that the Court vacate all existing litigation dates in this matter as it has been resolved in its entirety and as to all parties. The parties

additionally request that the Court adjourn the trial date set for May 5, 2015, for thirty (30) days while the parties finalize their settlement of the matter.

Dated: February 27, 2015

s/ Steve A. Miller

Steve A. Miller (pro hac vice admission) Scott C. Fanning (pro hac vice admission)

FISHER & PHILLIPS LLP

Chicago, IL 60606

Telephone: (312) 346-8061 Facsimile: (312) 346-3179 smiller@laborlawyers.com sfanning@laborlawyers.com

Courtney Leyes Tomlinson FISHER & PHILLIPS LLP 1715 Aaron Brenner Drive Suite 312, Renaissance Center Memphis, TN 38120 Telephone: (901) 526-0431 ctomlinson@laborlawyers.com

Attorneys for Defendant

Respectfully submitted,

s/ Gordon E. Jackson

Gordon E. Jackson
James L. Holt, Jr.
Timothy A. Perkins
JACKSON, SHIELDS, YEISER & HOLT
262 German Oak Drive
Memphis, Tennessee 38018
gjackson@jsyc.com
jholt@jsyc.com
tperkins@jsyc.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on February 27, 2015, a true and correct copy the foregoing **JOINT NOTICE OF SETTLEMENT** was served upon the following:

Gordon E. Jackson
James L. Holt, Jr.
Timothy A. Perkins

JACKSON, SHIELDS, YEISER & HOLT
262 German Oak Drive
Memphis, Tennessee 38018
gjackson@jsyc.com
jholt@jsyc.com
tperkins@jsyc.com
Attorneys for Plaintiff

via Email and regular First Class U.S. Mail delivery.

s/ Steve A. Miller

Steve A. Miller (*Pro hac vice*) COUNSEL FOR DEFENDANT